

**United States Environmental Protection Agency
Region VI
POLLUTION REPORT**

Date: Wednesday, June 29, 2005

From: Warren Zehner

Subject: POLREP 2

(FPN E05656) Advance Industries LLC - A Robichaux
Valentine Oil and Gas Field, 5.7 miles SW of Lockport, LA
Latitude: 29.6011110
Longitude: -90.4578880

POLREP No.:	2	Site #:	N/A
Reporting Period:		D.O. #:	N/A
Start Date:	1/4/2005	Response Authority:	OPA
Mob Date:		Response Type:	
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Assessment
CERCLIS ID #:	N/A	Contract #	
RCRIS ID #:		Reimbursable Account #	
FPN#	E05656		

Site Description

Site Location

The Advance Industries LLC - A Robichaux abandoned oil production facility (EPA ID 29-E-1040) was referred to EPA on December 1, 2004, by the State of Louisiana to be considered for OPA response actions. This facility is located in Valentine Oil and Gas Field (Field ID: 9096), approximately 5.7 miles southwest of Lockport, in Section 004, Township 17 South, Range 20 East of Lafourche Parish, Louisiana, at Latitude 29.6011111° North and Longitude 90.457888° West. The facility is accessed from the southeast via an access road off of Louisiana Hwy 308.

Site Description

The facility consists of three above ground storage tanks (AST), one heater treater (HT), one separator (S), and one production well. The facility components comprise one distinct potential spill source, identified as Source 1.

The facility serviced two production wells, identified as the A Robichaux Well No. 001 (SN 130555) and A Robichaux Well No. 001D (SN 131461). The Louisiana Department of Natural Resources (LDNR) records list these wells as orphaned. According to LDNR, the production and storage components were associated with SN 130555.

Previous Actions

After exhausting all available enforcement options at their disposal, the LDNR referred the Advance Industries LLC - A Robichaux facility for EPA review in December of 2004.

Current Activities

The facility was visited on June 28, 2005 by the EPA Region 6 FOSC, and a site reconnaissance was conducted at that time. LDNR Conservation Enforcement Specialist (CES) Keith Adams provided the FOSC and FOSCR access to conduct on-site activities. During the reconnaissance, the general condition of the facility and components was evaluated to determine the volume of oil and oil emulsion present, and a preliminary determination of substantial threat to navigable waters of the U.S. was documented using revised EPA Region 6 protocols.

Determination of Threat

LDNR records indicate that the contents of the surface components consist of non-hazardous oilfield waste (NOW) in the form of oil, oil-emulsion, and/or oily produced water. These fluids meet the definition of "oil" as defined by Section 1001(23) of OPA, 33 U.S.C § 2701(23). The surface components were not gauged during the reconnaissance, but their volumes were estimated by the FOSC from acoustic and thermal differential observations.

Drainage from the facility flows into a NWI wetland which is hydrologically connected and contiguous with a perennial tributary of Bayou Lafourche. Bayou Lafourche is navigable "in fact" and subject to interstate commerce. See site drainage map attached at the website for this facility.

The facility components were deemed to be inadequate due to heavy rust, corrosion, and delamination of the metal at their bases and on the interconnecting flow lines. At least two of ASTs were actively discharging oil to the environment. Pooled oil and oil saturated vegetation were readily visible in the existing containment around the ASTs. Heavy vegetation obscured the berm, making a determination of condition difficult. Volume of the containment appeared to be inadequate to the FOSC. See attached photographs at the website for this facility.

The FOSC has determined that a failure of the storage and process components through corrosion, vandalism or force majeure has a high potential to release a harmful quantity of oil within the meaning of Section 311 (b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), and 40 CFR § 110.3(b), into the site drainage and ultimately into Bayou Lafourche.

The EPA Region 6 FOSC has determined from his reconnaissance that Source 1 of this facility meets the revised Region 6 substantial threat criteria.

Next Steps

Phase II activities will be conducted. Phase II activities include a site assessment (SA) to obtain legally defensible field data that objectively quantifies and verifies the findings of substantial threat by the FOSC, and the enforcement/administrative support necessary to build the administrative record and a cost recovery case for the site. These actions will be consistent with the criteria found in the U.S.C.G. NPFC Users Guide, July 2002.

POLREP No. 3 will advise of RP response or actions in response to the NOFI, and the EPA FOSC intentions for this abandoned facility.

Key Issues

Enforcement

All previous enforcement efforts by LDNR have produced no timely or technically appropriate responsible party actions, as evident by the current conditions at the facility. The wells previously identified in this report as associated with this facility, the A Robichaux Well No. 001 (SN 130555) and A Robichaux Well No. 001D (SN 131461), were reported by LDNR as last operated by Advance Industries LLC (Operator code A120). LDNR records indicate these wells have been orphaned.

The EPA FOOSC will formally offer the responsible party (RP) the opportunity to conduct the necessary mitigation actions to abate any potential sources of release at the site through issuance of a Notice of Federal Interest (NOFI). If the RP declines to participate, or fails to timely respond to notice, EPA plans to proceed with an OSLTF financed cleanup action. The NOFI will clearly advise the RP they may be subsequently held liable for the cost of government funded cleanup actions.

A deed and title search will be ordered to identify any other potential responsible parties (PRPs). If other PRPs are identified, they will also be sent a NOFI.

Attachments

- USGS National Hydrography Data Set (NHD) Drainage Map (documents box on website)
- FOOSC Minimum Threshold Requirement Checklist for FPN E05656 (documents box on website)
- Photographs of Source 1 (images box on website)

All of the attachments are available on the [epaosc.net](http://www.epaosc.net) website as uploaded documents. Click on the hyperlink below to access the facility website to view the documents and photographs (images).

www.epaosc.org/FPNE05656